

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

OLD REPUBLIC TITLE, LTD.,

Plaintiff,

v.

TROY X. KELLEY and DIANE
DUFFRIN KELLEY, individually and as
a marital community,

Defendants.

No. 10-cv-0038-JLR

DECLARATION OF DEE LAMB

I, De Illa ("Dee") J. Lamb, affirm:

1. I am a former employee of the Post Closing Department ("PCD").

I make this declaration based on personal knowledge and am competent to testify about the matters set forth in this declaration.

2. Except for a brief period in 2003, I worked for PCD from the time the company started business until I was laid off in May 2008.

3. I had primary responsibility and handled the reconveyance services that PCD provided to Fidelity Title in Washington from October 2003 until that contract ended around one month before I was laid off.

DECLARATION OF DEE LAMB (No. 10-cv-0038-JLR) - 1

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Riddell Williams P.S.
1001 FOURTH AVENUE
SUITE 4500
SEATTLE, WA 98154-1192
206.624.3600

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed on August 20, 2010, in Fostoria, Ohio.

De Illa J. Lamb

EXHIBIT A

To are required to produce the "documents" describe below that are in your possession, custody, or control when you receive this subpoena. You are not to discard or withhold any of the requested "documents." You will likely need to search any computers and laptops you have used in recent years to locate the subpoenaed information. If you have any questions or concerns about the scope or this document request, please contact the attorney who issued it.

You are to produce:

All "documents" that refer or relate in any way to reconveyancing, reconveyance tracking or processing, Troy Kelley, the Post Closing Department, United National LLC, Blackstone International Inc., Attorney Trustee Services Inc., or any of other businesses of Troy Kelley.

This document request is intended to be comprehensive and includes, but is not limited to, any "documents" related to Troy Kelley, his businesses, and their business activities.

The reference to "document" includes, but is not limited to, any paper, agreement, reconveyance spreadsheet, log or report, note, book, photograph, reproduction, pamphlet, brochure, manual, periodical, letter, report, memorandum, summary, notation, statement, draft, message, telegram, telex, wire, cable, record, log book, study, working paper, map, survey, drawing, blueprint, sketch, model, chart, schedule, graph, index, tape, minutes, minute book, contract, lease, invoice, purchase order, journal, ledger, check, check stub, estimate, record of purchase or sale, correspondence, correspondence files, desk calendar, work paper, business form, appointment book, time sheet, business form, and printout.

It includes all electronically stored information, including but not limited to emails and information kept on a computer, laptop, computer disk, server, or in digital or computerized form, computer tape, computer printout, computer program, computer disk, or index thereto. If any of the requested "documents" are on any such computer equipment that is not currently operational, then produce the computer equipment that does or may contain the requested "documents."

It includes any pleading or court document, transcription or taping of telephone or personal conversation or conference, including intercompany, intracompany, interoffice, and intra office memorandum, or other document regarding any conference, conversation, or other communication, and any and all other written, printed, typed, taped, recorded, transcribed, punched, filmed, or graphic matter, however produced or

reproduced.

If a document has been prepared in several copies or additional copies have been made, and the copies are not identical, each non identical copy is a separate "document," and should be produced for inspection and copying.

Any electronically stored information is to be downloaded, unaltered, in its native format onto disk(s) that are to be produced.

CERTIFICATE OF SERVICE

Melinda R. Bergquam, states as follows:

I am over 18 years of age and a citizen of the United States. I am employed as an executive assistant by the law firm of Riddell Williams P.S.

On the date noted below I electronically filed the foregoing document titled **DECLARATION OF DEE LAMB** using the CM/ECF system and caused to be delivered true and accurate copies of the same via the CM/ECF system which will send notification of such filing to:

Judy A. Endejan, WSBA #11016
David C. Lundsgaard, WSBA #25448
GRAHAM & DUNN PC
Pier 70 – 2801 Alaskan Way, Ste. 300
Seattle, WA 98121-1128
Email: jendejan@grahamdunn.com
dlundsgaard@grahamdunn.com

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this Certificate of Service was executed on this 1st day of September, 2010, at Seattle, Washington.


Melinda R. Bergquam